

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

MOXA, INC.,

Defendant.

CIVIL ACTION NO. 6:21-cv-1335-ADA

JURY TRIAL DEMANDED

STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE

Under FED. R. CIV. P. 41(a)(2) and (c), plaintiff American Patents LLC (“American”) and defendant Moxa, Inc. (“Moxa”) hereby move for an order dismissing all claims and counterclaims in this action WITH PREJUDICE, subject to the terms of that certain agreement entitled “**LICENSE AGREEMENT**” and dated April 20, 2022 (the “Agreement”), with each party to bear its own costs, expenses and attorneys’ fees for this action, subject to the terms of that agreement. American and Moxa further request that the Court retain jurisdiction over this matter for the limited purpose of enforcing the Agreement.

Dated: May 2, 2022

Respectfully submitted,

/s/ Zachariah S. Harrington

Matthew J. Antonelli

Texas Bar No. 24068432

matt@ahtlawfirm.com

Zachariah S. Harrington

Texas Bar No. 24057886

zac@ahtlawfirm.com

Larry D. Thompson, Jr.

Texas Bar No. 24051428

larry@ahtlawfirm.com

Christopher Ryan Pinckney

Texas Bar No. 24067819
ryan@ahtlawfirm.com

ANTONELLI, HARRINGTON
& THOMPSON LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3000

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Bartles
Texas Bar No. 24104849
cbartles@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM, PC
815 South Broadway Avenue
Tyler, Texas 75701
(903) 593-7000

Attorneys for American Patents LLC

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for American Patents have conferred with counsel for Moxa, Inc., who confirms that this motion is stipulated and agreed.

By: /s/ Zachariah S. Harrington

Zachariah S. Harrington

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronics service are being served with a copy of this document via the Court's CM/ECF system on May 2, 2022.

By: /s/ Zachariah S. Harrington

Zachariah S. Harrington